

Message

From: Keating, Jim [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BD5FBA58AC5E4EFD9F96C1F37EBBE199-JKEATING]
Sent: 9/10/2019 12:16:46 PM
To: STURDEVANT Debra [Debra.STURDEVANT@state.or.us]
Subject: Re: follow up re mercury variance

Thanks for reaching out. I will get back to you.

Sent from my iPhone

On Sep 9, 2019, at 7:51 PM, STURDEVANT Debra <Debra.STURDEVANT@state.or.us> wrote:

Hello Jim, I appreciate your thinking about how a variance may work best for mercury. I wanted to clarify one point from today's conversation. When I asked if EPA understood that the 10% aggregate reduction from the TMDL was just the WLA for point sources, I was trying to understand how the HAC would be defined for a waterbody variance. I re-read the rule at 131.14 (b)(1)(ii)(B) (1) and (2). Frankly I am not sure how (B)(2), which is an exact replica of (A)(3), would be determined in the context of a waterbody variance. So if you have further thoughts that were lost on us today, I would appreciate hearing them.

Thanks again,
Debra

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Water Quality Standards website:
<https://www.oregon.gov/deq/wq/Pages/WQ-Standards.aspx>